



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

December 11, 2012

RE: LORAIN COUNTY
COLUMBIA TWP.
THE ACTIVITY CENTER
(11300 ROOT RD.)
(PERMIT NO. 3PR00487)

CERTIFIED MAIL

PNL Holdings
30628 Detroit Rd., # 299
Westlake, OH 44145
Attn: Don Porter

Dear Mr. Porter:

A compliance evaluation inspection (CEI) was conducted on The Activity Center wastewater treatment plant (WWTP), on November 20, 2012. The inspection was conducted by this writer, and Mr. John Sabo of the Lorain County Health Department. The facility is located at 11300 Root Road, Columbia Township. The most recent CEI conducted on the facility was on August 17, 2010.

The purpose of the inspection was to evaluate the WWTP's operation and maintenance condition, and its compliance with National Pollutant Discharge Elimination System (NPDES) Permit to discharge terms and conditions.

At the time of the November 20th inspection, the following observations were made:

- 1) The entire facility appeared to be vacant. There were no vehicles or personnel present, nor signs of recent activity.
- 2) The trash trap was on-line, and not in need of pumping.
- 3) Contents of the flow equalization tank were grayish in color, and were being aerated. Both pumps in the flow equalization tank were found in the 'AUTO' mode, and were operational when tested manually.
- 4) There were two blower/motors for the equalization tank, both of which were set in the 'AUTO' mode. Each blower/motor was manually tested individually, and was found to be operational.
- 5) At the time of the inspection, the contents of the aeration tank appeared to consist of only rainwater, and the contents were not being aerated. Blower/motors for the aeration tank were not operating, and when checked, were found in the 'AUTO' mode. When manually tested, both of the blower/motors would not operate. There were no odors in the vicinity of the aeration plant.

- 6) The return sludge line and skimmer line was not operating, as the plant was not being aerated.
- 7) The settling tank contents also appeared to consist of rainwater, and the effluent trough in the settling tank was clean.
- 8) Both sand filter dosing station pumps were set on 'AUTO', and when manually tested, the pumps operated satisfactorily. The high water level alarm also operated when manually tested. A pump usage totalizer was present in the electrical control box, and is used in calculating flow for the system.
- 9) When manually dosed, the west sand filter cell was in use. There were no solids on the sand in either filter cell, although there was a small amount of dead vegetation in both cells.
- 10) When operating, effluent disinfection is accomplished by use of an Ultra Violet (UV) disinfection unit. At the time of the inspection, the audible alarm for the UV unit was found to be sounding, indicating a malfunction of the unit. The audible alarm was silenced at the time of the inspection, and the UV unit appeared to be non-operational.
- 11) Contents of the aerated sludge holding tank were not being aerated, and appeared to consist of rainwater.

Prior to the inspection, a review of the WWTP operating data for the period of August 1, 2010, through December 1, 2012, was conducted. The electronic Discharge Monitoring Report (eDMR) data submitted for that period found the following effluent numeric violations:

**THE ACTIVITY CENTER
 NPDES PERMIT # 3PR00487
 EFFLUENT NUMERIC VIOLATIONS
 (Aug. 1, '10 – Dec. 1, '12)**

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
August 2010	Nitrogen, Ammonia (NH3-N)	30D Conc	1.0	2.38	8/1/2010
August 2010	Nitrogen, Ammonia (NH3-N)	7D Conc	1.5	2.38	8/1/2010
August 2010	Dissolved Oxygen	1D Conc	6.0	3.8	8/4/2010
December 2010	Total Suspended Solids	30D Conc	12	42.	12/1/2010
December 2010	Total Suspended Solids	7D Conc	18	42.	12/8/2010
June 2011	Dissolved Oxygen	1D Conc	6.0	5.3	6/8/2011
June 2012	Total Suspended Solids	30D Conc	12	56.	6/1/2012
June 2012	Total Suspended Solids	7D Conc	18	56.	6/8/2012

The eDMR data review also revealed that no operating data has been submitted to the Ohio EPA since June 30, 2012, for the Activity Center. The eDMR submittals have indicated 'No Discharge' after July 1, 2012.

Based upon visual observations of the WWTP and property made during the inspection, as well as the 'No Discharge' indication on monthly eDMR submittals since July 2012, it is assumed that the Activity Center building is presently not being used.

Please note, if the building is planned for use in the future, the monthly eDMR submittals must still continue, indicating there is no discharge from the WWTP. Also note that the NPDES permit must be kept effective, otherwise the permit may be revoked or not renewed. Once the NPDES permit is not issued for the facility, if one is desired in the future, it can be very difficult to obtain a new NPDES permit.

The current NPDES permit for the facility, 3PR00487*AD, will expire on July 31, 2013. An NPDES permit renewal application is to be submitted to the Ohio EPA by 180 days prior to the permit expiration (January 31, 2013). Enclosed are the necessary forms, which need to be completed, and submitted to this office with appropriate renewal fee, prior to January 31, 2013.

The existing NPDES permit currently requires the WWTP to be operated by a Class I licensed operator. The existing permit is presently under modification, to reduce the required operator to a Class A certification. The renewed permit will also require the WWTP to be under the operation of a Class A licensed operator. **An Operator of Record Certification (ORC) form is to be submitted to the Ohio EPA, with the name of the licensed operator in charge of the Activity Center WWTP.** The ORC form is also enclosed with this inspection report.

Please submit the aforementioned forms to this office by January 31, 2013. If you wish to permanently close the facility and terminate the NPDES permit for the WWTP, please inform this office as well. If there are questions or comments regarding the contents of this letter, please contact this office.

Respectfully,



Charles E. Allen
Environmental Engineer
Division of Surface Water

CEA/cs

Enclosures

cc: John Sabo, Lorain County Health Department

SP/Lorain/ColumbiaTwp/TheActivityCenter